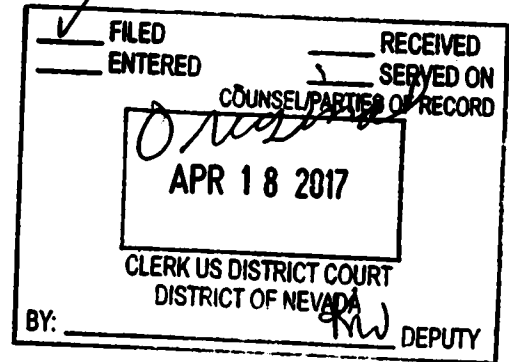


TERRY KERR  
DENNIS KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266  
PRO-SE PLAINTIFFS



IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

TERRY KERR AND DENNIS KERR,

PLAINTIFFS,

-V-

U.S. BANK N.A. AND U.S. BANK  
N.A. AS TRUSTEE OF SW REO  
TRUST 2014-!, BANK OF AMERICA  
N.A. MICHEAL BROOKS ESQ.,  
RAMIR HERNANDEZ ESQ., DARREN  
BRENNER ESQ., WILLIAM HADBAS  
ESQ., RICHARD REYNOLDS ESQ.,  
R. ARRON CHASTAIN ESQ., AND  
HARMONY TITLE AGENCY, PLUS  
DOES 1-10.

DEFENDANTS.

CASE NO. 3:17-00012-RJC-VPC

MOTION FOR RECONSIDERATION  
OF COURT ORDER

COMES NOW PLAINTIFFS PRO-SE TERRY KERR AND DENNIS KERR  
WITH THEIR MOTION FOR RECONSIDERATION OF THE ORDER FILED ON  
APRIL 13, 2017 THAT DENIED THE MOTION FOR DEFAULT JUDGEMENT  
AND THE MOTION FOR SANCTIONS AND GRANTED A MOTION TO DISMISS.  
1. MOTIONS FOR RECONSIDERATION WHICH NEW ISSUES OF FACT OR  
LAW THAT ARE RAISED SUPPORTING A RULING CONTRARY TO THE RULING  
ALREADY REACHED IS DESCRIBED IN ( MOORE V. CITY OF LAS VEGAS  
92 NEV. 402, 405, 551 p2d 244,246 ( 1976 ). A DECISION MAY BE  
RECONSIDERED IF SUBSTANTIALLY DIFFERENT EVIDENSE IS SUBSEQUENTLY  
INTRODUCED OR THE DECISION IS CLEARLY ERRONEOUS. MASONRY AND  
TITLE CONTRACTORS ASSN OF S. NEV. V. JOLLEY, URG AND WIRTH 113

NEV. 737,741,941 p2d 486 489 (1997).

3. THE PLAINTIFFS DID DO PLAIN STATEMENTS OF THE CLAIMS AND DID SHOW WHAT THE GROUNDS OF THE LAWSUIT WERE ABOUT. HAD THE COURT READ ANY OF THE PLAINTIFFS BRIEFS. THERE WAS THE CLEAR AND CON-  
SISE EVEDENCE AND FACTS WITH EXHIBITS OF PROOF CLEARING SHOWING WHAT WAS THE ISSUES. THERE WAS CLEARY AN ABUSE OF DISCRETION HERE

4. THE MOTION FOR DEFAULT FILED AGAINST U.S. BANK AND THE AMENDED MOTION FOR DEFAULT FILED AGAINST U.S. BANK WAS NOT EVEN MENTIONED IN THE ORDER. THIS WAS DONE BECAUSE THE U.S. BANK DID NOT FILE AN ANSWER TO THE SUMMONS AND COMPLAINT AS REQUIRED. THIS WAS TO BE BROUGHT UP AT THE HEARING SCHEDULED FOR MAY 2, 2017, AND ALSO THERE WAS A MOTION FOR SUBMISSION ON THE MOTION FOR DEFAULT FILED AGAINST THE U.S. BANK, BUT NEVER MENTIONED AT ALL BY THE COURT! ALL THE PROPER PAPERWORK WAS FILED.

5. THE COURT GOES ON TO SAY THAT THE COURT COULD NOT SEE HOW THE PLAINTIFFS WOULD BE ADVERSLY AFFECTED BY THE MISREPRESENTATION OF THE HOUSE HAVING A LEGAL VALID LIS PENDANS COURT LIEN ON THE HOUSE. THE NEW OWNERS OF THE HOUSE SOLD TO THEM NOW GO AFTER THE PLAINTIFFS TO EVICT THEM AND PAY THEM MONEY FOR BEING THERE. THEY COULD NOT DO THIS LEGALLY JUST THE SAME AS GETTING THE TITLE TO ISSUE A CLEAN TITLE WHEN IT WAS NOT AND THEN EVICTING THE PLAINTIFFS. THIS WAS ALL CONSPIRED AND WAS CLEARING SHOWN IN THE EXHIBITS OF PROOF HAD THE COURT LOOKED AT THE PLAINTIFFS PLEADING S, THE PURCHASER WAS WORKING WITH BANK OF AMERICA TO DO THIS AND THE ATTORNEY FOR HARMONTY TITLE AND THE U.S. BANK AND BANK OF AMERICA WERE THE SAME PERSON. IT WAS A CONSPIRED EVENT OF CRIMINAL CRIMES AS COVERED IN THE RACKETEER INFLUENCED AND CORUPT ORGANIZATION ACT VIOLATIONS. ROBERT C. JONES WHO DID THE ORDER,

NEW FACTS AND LAWS

1. EXHIBIT A IS THE MOTION FOR THE HEARING TO BE HELD FOR UNLAWFULL DETAINER IN THE SPARKS JUSTICE COURT. IT DOES SHOW THAT THERE IS A FRAUD COMPLAINT FILED WITH THE POLICE,

2. EXHIBIT A-1 IS THE POLICE STATEMENT FOR FRAUD.

3. EXHIBIT B IS THE LETTER FROM THE STATE BAR OFFICE OF THE CHIEF TRIAL COUNSEL THAT IS INVESTIGATING THE FRAUD CHARGES.

4. EXHIBIT B-1 IS THE LETTER TO THE CALIFORNIA STATE ATTORNEY GENERAL FOR THE COMPLAINT OF FRAUD AND REACKETEER INFLUENCED AND CORUPT ORGANIZATION ACT VIOLATIONS. THE CRIMES AND THE CONSPIRACY TO EVICT THE PLAINTIFFS WERE DONE BY BANK OF AMERICA AND THE LAWYERS.THIS EVIDENSE OF THE CRIMINALS RACKETEERING WAS NOT EVEN LOOKED AT IN NEVADA. THERE WAS 2 LETTERS TO THE NEVADA PEOPLE BUT NO RESPONSES. WHAT HAPPENS WHEN THEY GET CHARGED WITH THE VIOLATION OF NRS 14.010? JUST THE SAME AS ALWAYS THE BANK OF AMERICA JUST PAYS THEM ALL OFF FOR INJUSTICE! WELL THE PLAINTIFF DID CHECK ON BROOKS HOUSES AT THE COURTHOUSE IN VEGAS AND HE HAS STOLEN LOTS OF THEM. THAT IS WHY HE MUST CONTINUE TO STEAL CAUSE HE NEEDS HIS NEW DOPAMINE AND ENDORPHIN SECRETIONS IN THE BRAIN FOR HIS HIGHS AND PLEASURES. HE IS LIKE THE CRIMINAL IN THE WHYAT ERUP SHOW JOHNEY RINGO WHO COULD NOT ROB ENOUGH, HE COULD NOT STEAL ENOUGH, HE COULD NOT MURDER ENOUGH PEOPLE, CAUSE HIS ONLY SATISFATION WAS ROBBING STEALING AND MURDERING, THE SAME AS BROOKS. HOW MANY HOUSES DID HE STEAL AND THE OWNERS COMMITTED SUICIDE CAUSE OF IT? THAT JUST MAKES HIM MORE HIGH. YOU SEE YOU HAVE TO HAVE A SOUL TO HAVE A CONSCIENCE! he wants ceo BRIAN MOYNIHAM OF BANK OF AMERICA TO PAY HIM FOR DELIVERING TERRY KERRS HEAD ON A PLATTER, PURE AND SIMPLE. WHEN

the state judge simpson did a judicial foreclosure ON THE HOUSE  
TERRY KERR LIVED IN IN IDAHO AND HE WAS FORCED TO LEAVE THE  
HOME BRIAN MOYNIHAM FLEW TO IDAHO FALLS IDAHO AND COMPLAINED TO  
THE SHERIFF THAT THEY WERE NOT EVICTING TERRY KERR FAST ENOUGH.  
THE HOUSE WAS IN FEDERAL COURT AND THERE WAS A FEDERAL COURT LIEN  
ON THE HOUSE WHEN THE STATE COURT JUDGE SOLD IT ILLEGALLY. EVEN  
THOUGH IT WAS PROVED BY KERR, THE JUDGE NEVER GOT ANYTHING DONE  
TO HIM FOR THE CRIME AND THEN THE SAME THING HAPPENS HERE.  
EVERYONE WANTS SOME BANK OF AMERICA MONEY FOR NAILING TERRY KERR  
TO THE CROSS! WELL, TERRY KERR IS A WARIOR FOR JUSTICE AND HAS  
BEEN IN COURT FOR 9 YEARS AND WILL CONTINUE TO BE A WARIOR FOR  
JUSTICE TILL THEY MURDER HIM LIKE THEY DID TO MARTIN LUTHER KING.  
AMAN, AMAN AMAN AMAN AMAN AMAN AMAN AMAN AMAN AMAN ETC.

DONE AND ~~DATED~~ THIS 18th DAY OF APRIL, 2017.

BY PRO-SE PLAINTIFFS TERRY KERR AND DENNIS KERR

Terry Kerr Dennis Kerr

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT A COPY OF THE MOTION FOR CONSIDERA-  
TION WAS SENT TO THE DEFENDANTS AT THESE ADDRESS, AKERMANS AT  
1160 TOWN CENTER DRIVE SUITE 330, LAS VEGAS NEVADA 89144, brooks  
AT 1645 VILLAGE CENTER CIRCLE, SUITE 60 LAS VEGAS, NEVADA 89134,  
RICHARD REYNOLDS 1851 FIRST STREET SUITE 1550 SANTA ANA C.A. 92705  
arron chastain 1819 fifth ave north, birminham a.l. 35203, u.s.  
bank, 301 vassar street reno, nevada 89502.

DONE AND DATED THIS 18th DAY OF APRIL, 2017

BY PLAINTIFFS PRO-SE TERRY KERR AND DENNIS KERR

Terry Kerr Dennis Kerr

LIST OF EXHIBITS OF PROOF

1. THE SPARKS JUSTICE COURT PAPERS WHERE RACIAL ANIMUS IS OPENLY PRACTICED.
- 2, EXHIBIT A-! THE POLICE COMPLAINT
3. EXHIBIT A-2 THE COMPLAINT TO THE CALIFORNIA STATE BAR
4. EXHIBIT B IS THE LETTER FROM THE OFFICE OF THE CHIEF TRIAL COUNSEL
- 5.EXHIBIT B-1 IS THE COMPLAINT TO THE CALIFORNIA STATE ATTORNEY GENERAL BECERRA
6. EXHIBIT C IS THE FORGOTTEN ON PURPOSE DEFAULT BY THE JUDGE SAYING IT DID NOT HAPPEN BUT IT IS IN THE FILE. JUST COVERED UP.
7. EXHIBIT D IS THE LETTER SENT TO LAXAULT WHO NEVER RESPONDED

*Exhibit A*FILED  
ANITA WHITEHEAD CLERK  
SPARKS JUSTICE COURT

APR 18 2017

By

*E. Reed*  
DEPUTY CLERK*Original*

DENNIS KERR  
TERRY KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266  
DEFENDANTS PRO-SE

## SPARKS JUSTICE COURT

COUNTY OF WASHOE, STATE OF NEVADA

U.S. BANK N.A. AND SW )  
REO TRUST 2014-1, )

PLAINTIFFS, )

DENNIS KERR AND TERRY )  
KERR AND DOES 1-10, )

DEFENDANTS, )

CASE NO. 17-SCV-0382

MOTION FOR POSTPONMENT UNTILL  
CRIMINAL FRAUD CHARGES ARE DONE

COMES NOW DEFENDANTS PRO-SE DENNIS KERR AND TERRY KERR  
WITH THIER MOTION FOR A POSTPONMENT OF THE HEARING UNTILL THE  
CRIMINAL COMPLAINTS ARE COMPLETED.

1. ENCLOSED IS THE EXHIBIT A, THE SPARKS POLICE STATEMENT THAT  
THE DEFENDANTS HAVE FILED AGAINST THE U.S. BANK AND THE LAWYERS  
BROOKS AND HERNANDEZ FOR FRAUD. RXHIBIT A.

2. EXHIBIT B IS THE FRAUD CHARGES AGAINST U.S. BANK AND THE  
LAWYERS WITH THE STATE BAR OF CALIFORNIA AND THE CALIFORNIA  
STATE ATTORNEY GENARAL.

3. ALSO THE DEFENDANTS WERE NEVER SERVED A SUMMONS AND THE  
COMPLAINT AND THE HEARING SHOULD HAVE BEEN POSTPONED UNTILL  
THEY WERE SERVED.

4. the case in the sparks police complaint is 17-3348.

5. THE COMPLAINT GOES TO THE DETECTIVES FIRST AND THEN TO THE  
WASHOE COUNTY DISTRICT ATTORNEY OFFICE SO IT IS NOT KNOWN HOW

LONG IT WILL TAKE. THE EDUCATED GUESS WAS A FEW WEEKS.

CONCLUSION

THE CONCLUSION IS THAT THE U.S. BANK AND THE ATTORNEYS BROOKS AND HERNANDEZ WILL BE CHARGED WITH FRAUD CRIMES AND THEREFORE IT WOULD BE PRE-MATURE TO HAVE A HEARING WHILE THE FRAUD CRIMES ARE BEING INVESTIGATED!

DONE AND DATED THIS 18th DAY OF APRIL, 2017.

BY DEFENDANTS PRO-SE DENNIS KERR AND TERRY KERR

Dennis Kerr Terry Kerr

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT A COPY OF THE MOTION FOR POSRPONMENT OF THE HEARING WAS SENT TO THE LAWYERS AT 1645 VILLAGE CENTER CIRCLE, SUITE 60, LAS VEGAS NEVADA, 89134 on this 18th DAY OF APRIL, 2017.

DONE AND DATED THIS 18th DAY OF APRIL, 2017

BY DEFENDANTS PRO-SE DENNIS KERR AND TERRY KERR

Dennis Kerr Terry Kerr



## STATEMENT

CASE NO.: 17-3348

CASE TYPE: FRAUD

TAKEN BY: OFC SITTON

Exhibit A-1

## PERSON MAKING THE STATEMENT

NAME OF PERSON MAKING STATEMENT <u>TERRY KERR</u>				OTHER NAMES USED	
RESIDENCE ADDRESS <u>580 ASHMAN ST. SPARKS, NV 89441</u>				HOME PHONE <u>208-520-7266</u>	
WORK / SCHOOL ADDRESS				WORK PHONE	
RACE <input type="checkbox"/> Am. Indian/Alaska Natv <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> East Indian <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> White <input type="checkbox"/> Other	SEX <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DATE OF BIRTH <u>Jan 24/1949</u>	SOCIAL SEC. NO. <u>517-58-6540</u>		FAX/CELL <u>208-520-7266</u>
HEIGHT <u>6'3"</u>		WEIGHT <u>240</u>	HAIR <u>Brown</u>	EYES <u>Green</u>	OTHER NO. TO CALL
DRIVER'S LIC. / STATE I.D. NUMBER <u>IDAHO GB1966091</u>			STATE <u>ID</u>	EMAIL ADDRESS <u>NONE</u>	
BUSINESS / SCHOOL NAME			OCCUPATION / GRADE <u>Social Security</u>	WORK HOURS DAYS OFF <u>MTWTFSS</u>	
INVOLVEMENT <input type="checkbox"/> Complainant <input type="checkbox"/> Driver <input type="checkbox"/> Passenger <input type="checkbox"/> Victim <input type="checkbox"/> Witness		LOCATION OF OCCURRENCE			
<input type="checkbox"/> AUTO <input type="checkbox"/> TRUCK	<input type="checkbox"/> MOTORCYCLE <input type="checkbox"/> OTHER	MAKE	MODEL	YEAR	LICENSE NO./REGISTRATION
		STATE	YEAR	VEHICLE COLOR(S)	
IDENTIFYING FEATURES / ACCESSORIES		VEHICLE VALUE		VEHICLE IDENTIFICATION NUMBER	

## STOLEN VEHICLE WAIVER

Know all persons by those presents: That I, \_\_\_\_\_ of the City of \_\_\_\_\_ County of \_\_\_\_\_ State of \_\_\_\_\_ do by these presents, for myself, my heirs, executors, administrators or assigns, release each, every, and all duly-appointed peace officers of a city, county or of the State of Nevada, from any claim, action demand, dues, sums of money, controversies, trespasses, judgments, executions, claims and demands whatsoever, in law or in equity, I ever had or now have or which I, or my heirs, executors, administrators or assigns, hereinafter can, shall or may have against any peace officer or peace officers, for, upon or by reason of any matter, cause, or thing whatsoever, as a result of said peace officer or peace officers recovering, holding, storing, or conveying the above-described vehicle, pursuant to the stolen report which I have this day made. I understand that I am liable for all towing and storage charges incurred during the recovery of the vehicle.

SIGNATURE OF OWNER / AGENT

## CONSENT TO RELEASE MEDICAL RECORDS

I, \_\_\_\_\_ do hereby knowingly and voluntarily authorize \_\_\_\_\_ or any Detective of the Sparks Police Department to request and obtain any and all medical treatment records from \_\_\_\_\_ to \_\_\_\_\_ for \_\_\_\_\_

Name of Patient \_\_\_\_\_ Date of Birth \_\_\_\_\_ SSN \_\_\_\_\_ The purpose of this request concerns an investigation involving the person subject to the medical record inquiry. I realize I have the right to refuse this request.

Signature of Person Authorizing

Signature of Witness

## WRITTEN STATEMENT

1. Terry Kerr and Dennis Kerr own the House
2. at 580 Ashman Street, Sparks, Nevada 89441
3. The Bank of America For no Reason doubled
4. the monthly Payment. Terry Kerr and Dennis
5. Kerr filed a Lawsuit against Bank of America.
6. They put a lis Pendens Court Lien, Called a
7. notice of Pendency of action on the Property
8. and according to Nevada Law NRS 14.010

DATE & TIME OF THE STATEMENT: Date April 17, 2017 Time 5:30

NRS 207.280 MAKES IT UNLAWFUL TO FILE A FALSE POLICE REPORT

NUMBER OF PAGES IN STATEMENT \_\_\_\_\_

SIGNATURE OF PERSON MAKING THIS STATEMENT X Terry Kerr



EXHIBIT A-1

WRITTEN STATEMENT

9 the House cannot be sold till the Court Law  
 10 Suit is settled. the Bank of America sold  
 11 the House illegally and then could not sell  
 12 the House cause of the Lien and gave Back  
 13 the money charged and did Full Reconveyance  
 14 of the Property to the Kerns. the Kerns  
 15 then Filed a new law Suit in Federal  
 16 Court and put a new Lis Pendens Court Lien  
 17 called a notice of pending actions on the  
 18 Property, the Bank of America Lawyers Brooks  
 19 who has a California law license also and  
 20 was the attorney for the title company who  
 21 did issue a Clean title to the U.S. Bank  
 22 and the title company could not give a  
 23 Clean and Clean title did a Falsified  
 24 Fraudulent Deed to the U.S. Bank also  
 25 represented by Brooks Lawyers who had  
 26 the title company do the Falsified Fraudulent  
 27 Deed in violation of the NRS 14,010 and  
 28 then Filed a case of unlawful detainer in  
 29 the Sparks Justice Court, the office of the  
 30 Chief Trial Counsel of California and the California  
 31 attorney General have taken up the case but  
 32 the Sparks Justice Court Judge in Case 17  
 33 SCV. 0382 says a Nevada Fraud Complaint  
 34 must be filed. So Sam Filed a Fraud  
 35 Complaint for a wrongful detainer case  
 36 using a Falsified Document as evidence.

SIGNATURE OF PERSON MAKING THIS STATEMENT X. Steve Kern

*Exhibit A-2*

CRIMINAL COMPLAINT TO THE CALIFORNIA  
STATE BAR

---

TERRY KERR AND DENNIS KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266

APRIL 4, 2017

RE: CRIMINAL LAWYERS SUBMITTING FORGED AND  
FALSIFIED DOCUMENTS TO THE COURT TO MAKE  
LEGAL OBJECTIVE THREW THE USE OF ILLEGAL  
BAD FAITH MISCONDUCT.

GREETINGS CALIFORNIA STATE BAR,

1. THIS IS A COMPLAINT AGAINST THE UNETHICAL AND CRIMINAL BAD FAITH MISCONDUCT DONE BY THE CRIMINAL LAWYER IN A CONSPIRED CRIME AND PAID FOR BY THE BANK OF AMERICA, AND TRUSTEE CORPS.
2. richard reynolds and joe buckman of the trustee corps did conspire to do a trustee sale for trustee corps the kerrs home in sparks ,nevada. THEY DID CONSPIRE WITH LAWYERS FROM LAS VEGAS NEVADA NAMED MICHEAL BROOKS AND RAMIR HERNANDEZ. ALL LAWYERS ARE CALIFORNIA LAWYERS, REYNOLDS, BUCKMAN, BROOKS AND HERNANDEZ HAVE CALIFORNIA LAW LISENCES.
3. THE ADDRESSES FOR REYNOLDS AND BUCKMAN IS 1851 FIRST STREET SUITE 1550, SANTA ANA, CALIFORNIA 92705, AND THE ADDRESSES FOR BROOKS AND HERNANDEZ IS 1645 VILLAGE CENTER CIRCLE, SUITE 60, LAS VEGAS, NEVADA 89134.
4. THE CLEAR AND CONCISE AND UNDISPUTABLE EVIDENSE OF THE CRIMES THE UNETHICAL CRIMINAL LAWYERS HAVE DONE IS ATTACHED, THE OUTLINE OF THE CRIMES IN A BLOW BY BLOW FASHION SUPPORTED BY THE EXHIBITS OF PROOF AND TRUTH, AND UNDISPUTABLE FACTS.

SINCERLY TERRY KERR, DENNIS KERR

*Terry Kerr Dennis Kerr*

APR 17 2017

By E. Reed  
DEPUTY CLERK

DENNIS KERR  
TERRY KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266  
DEFENDANTS PRO-SE

SPARKS JUSTICE COURT

COUNTY OF WASHOE, STATE OF NEVADA

U.S. BANK N.A. AND SW REO )  
TRUST 2014-1, )

PLAINTIFFS, )

DENNIS KERR AND TERRY )  
KERR AND DOES 1-10. )

DEFENDANTS. )

CASE NO. 17-SCV-0382

DEFENDANTS RESPONSE TO THE  
PLAINTIFFS OMNIBUS RESPONSE

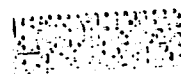
COMES NOW DEFENDANTS DENNIS KERR AND TERRY KERR AND  
OCCUPANTS, WITH THERE RESPONSE TO THE PLAINTIFFS OMNIBUS  
RESPONSE. FIRST THERE IS THE LAWYER BROOKS SAYING THAT  
THE DEFENDANTS CASE HAS NO MERITS. THE OFFICE OF THE CHIEF  
TRIAL COUNSEL FOR THE STATE OF CALIFORNIA HAS TAKEN THE CASE  
SEE THE CASE SHOWING THE STATE BAR DOING THE CASE.

OFFICE OF CHIEF TRIAL COUNSEL/INTAKE

The State Bar of California  
845 S. Figueroa Street  
Los Angeles, CA 90017-2515

04/13/2017

17-SCV-0382



ZIP 90017  
011E12650145

Name

Kerr, Terry & Dennis  
580 Aswan St  
Sparks, NV 89441

Street

Case No. 17-05906

City

State

Zip

8944130557 R008



CRIMINAL COMPLAINT TO THE CALIFORNIA  
STATE ATTORNEY GENERAL BECERRA

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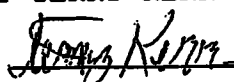
TERRY KERR AND DENNIS KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266

APRIL 10, 2017

RE: CRIMINAL COMPLAINT AGAINST HARMONY TITLE  
AGENCY, AND CRIMINAL LAWYERS FOR TRUSTEE  
CORPS, RICHARD REYNOLDS, JOE BUCKMAN, RAMIR  
HERNANDEZ AND MICHEAL BROOKS.

GREETINGS CALIFORNIA STATE ATTORNEY GENERAL BECERRA,  
TERRY KERR AND DENNIS KERR OWN A HOME IN SPARKS, NEVADA,  
AND THE TRUSTEE CORPS AT 1851 EAST FIRST STREET, SUITE 1550  
SANTA ANA, CALIFORNIA, 92705, HAD THE HARMONY TITLE AGENCY  
AT 17100 GILLETTE AVE., IRVINE, CALIFORNIA 92612, DO A  
FALSIFIED FRAUDULENT DECEPTIVE DEED ON THE KERRS HOME IN  
SPARKS, NEVADA. THERE WAS A FEDERAL LIS PENDANS COURT LIEN,  
AND A STATE NOTICE OF PENDANCY OF ACTION FILED ON THE HOME  
AND THE TITLE COULD NOT BE GIVEN AS A TRUE TITLE WITH NO  
CLOUDS OR OBSTUCTIONS ON THE DEED AND WAS SOLD AS A CLEAR  
TITLE TO ANOTHER BANK. THE LAWYERS BROOKS AND HERNANDEZ AT  
1645 VILLAGE CENTER CIRCLE, SUITE 60, LAS VEGAS, NEVADA 89134  
and the trustee corps lawyers who own harmony title agency  
AT THE ADDRESS OF 1851 EAST FRIST STREET, SUITE 1550 RICHARD  
REYNOLDS AND JOE BUCKMAN DID CONSPIRE TO DO THE FALSIFIED  
FRAUDULENT DEED. THE TOTAL TRUTH AND EVIDENSE AND FACTS ARE  
ARE INCLUDED IN THE SUMMARY OF THE FACTS TRUTH AND EVIDENSE  
ATTACHED. THESE CROOKS TRYED TO MAKE A LEGAL OBJECTIVE USING  
ILLEGAL MEANS ALL TOTALLY DOCUMENTED. PLEASE PUT THEM IN JAIL!

SINCERELY TERRY KERR AND DENNIS KERR





*Exhibit C*

TERRY KERR  
DENNIS KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266  
PRO-SE PLAINTIFFS

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

TERRY KERR AND DENNIS KERR, )  
 )  
 PLAINTIFFS, )

-V- )

U.S. BANK N.A. AND U.S. BANK )  
N.A. AS TRUSTEE OF SW REO )  
TRUST 2014-1, BANK OF AMERICA )  
N.A., MICHEAL BROOKS ESQ., )  
RAMIR HERNANDEZ ESQ., DARREN )  
BRENNER ESQ., WILLIAM HABDAS )  
ESQ., RICHARD REYNOLDS ESQ., )  
R.ARROR CHASTAIN ESQ., AND )  
HARMONY TITLE AGENCY, PLUS )  
DOES 1-10. )  
 )  
 DEFENDANTS. )

CASE NO. 3:17-CV-00012-RJC-VPC

MOTION FOR SUBMISSION ON THE  
MOTION FOR AMENDED DEFAULT

COMES NOW PLAINTIFFS PRO-SE TERRY KERR AND DENNIS KERR  
WITH THIER MOTION FOR SUBMISSION ON THEIR MOTION FOR AMENDED  
DEFAULT. ALL THE PROPER PARTS OF THE AMENDED MOTION FOR DEFAULT  
BY THE U.S. BANK HAVING BEEN FILED WITH THE COURT AND NOW THE  
PLAINTIFFS ARE ASKING THE COURT TO RULE ON THE MOTION FOR THE  
AMEANED DEFAULT.

DONE AND DATED THIS 8th DAY OF APRIL, 2017.

BY PLAINTIFFS PRO-SE TERRY KERR AND DENNIS KERR

*Terry Kerr* *Dennis Kerr*

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT A COPY OF THE MOTION FOR THE  
SUBMISSION OF THE AMENDED DEFAULT WAS SENT TO THE DEFENDANT  
AT U.S. BANK, 301 VASSAR STREET, RENO, 89502, ON THIS 8th  
DAY OF APRIL, 2017, BY U.S. MAIL.

DONE AND DATED THIS 8th DAY OF APRIL, 2017.

BY PLAINTIFFS PRO-SE TERRY KERR AND DENNIS KERR

Terry Kerr Dennis Kerr

TERRY KERR  
DENNIS KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266  
PRO-SE PLAINTIFFS

ORIGINAL

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

TERRY KERR AND DENNIS KERR, )

PLAINTIFFS, )

-V- )

CASE NO. 3:17-CV-00012-RJC-VPC

U.S. BANK N.A. AND U.S. BANK )

N.A. AS TRUSTEE OF SW REO )

TRUST 2014-1, BANK OF AMERICA )

N.A., MICHEAL BROOKS ESQ., )

RAMIR HERNANDEZ ESQ., DARREN )

BRENNER ESQ., WILLIAM HABDAS )

ESQ., RICHARD REYNOLDS ESQ., )

R.ARRON CHASTAIN ESQ., AND )

HARMONY TITLE AGENCY, PLUS )

DOES 1-10. )

DEFENDANTS. )

AFFIDAVIT IN SUPPORT OF THE  
AMENDED DEFAULT JUDGEMENT

STATE OF NEVADA )

) SS

COUNTY OF WASHOE )

COMES NOW PLAINTIFFS PRO-SE TERRY KERR AND DENNIS KERR  
WITH THEIR AFFIDAVIT IN SUPPORT OF THE AMENDED DEFAULT JUDGEMENT  
AND SWEAR THAT THE FOLLOWING ASSERTIONS ARE TRUE TO THE BEST OF  
THEIR KNOWLEDGE AND BELIEF AS PROVIDED:

1. AFFIANTS ARE THE PLAINTIFFS IN THE ABOVE ENTITLED ACTION AND  
HAVE MADE CAREFULL INVESTIGATION IN THE CAUSE AND HAVE BEEN  
INFORMED AND BELIEVES THAT THE DEFENDANT U.S. BANK N.A. ARE  
NOT IN THE MILITARY SERVICE THE UNITED STATES, NOR ARE THEY

INFANTS, OR INCOMPETANT DEFENDANTS.

2. THE DEFENDANTS WERE SERVED THE COMPLAINT AND THE SUMMONS ON THE 11th DAY OF JANUARY, 2017 at the following location, u.s. BANK N.A., AT 301 VASSAR STREET, RENO, NEVADA 89502. THE AFFIDAVIT OF SERVICE WAS FILED WITH THE COURT AND DATE STAMPED BY THE COURT THE 2nd DAY OF FEBRUARY, 2017. WITH THE CLERK OF THE DISTRICT COURT, DISTRICT OF NEVADA.

3. AFFIANTS ARE FURTHER INFORMED AND BELIEVES THAT THERE IS NOW DUE AND OWING FROM THE SAID DEFENDANTS TO THE PLAINTIFFS THE PRINCIPAL SUM OF \$268,000 DOLLARS. THIS IS THIS DEFENDANTS PRINCIPAL SUM OWED TO THE PLAINTIFFS FOR THE DEMAND IN THE UNANSWERED LAW SUIT. THERE IS ANOTHER \$592 DOLLARS IN COSTS AND FES INCURRED FOR A TOTAL OF \$268,592 DOLLARS.

4. THE OTHER DEFENDANTS DID ANSWER THE SUIT, THE BANK OF AMERICA N.A. ANSWERED THE SUIT ON THE LAST DAY AND NEVER SENT THE ANSWER TO THE PLAINTIFFS BUT THE JUDGE SENT A STATEMENT TO THE PRO-SE PLAINTIFFS A FEW DAYS LATER, SO THE BANK OF AMERICA N.A. WAS ON THE DEFAULT MOTION BUT GOT TAKEN OFF AND THAT IS WHY THE AMENDED MOTION FOR DEFAULT WAS DONE.

DONE AND DATED THIS 10<sup>TH</sup> DAY OF APRIL, 2017.

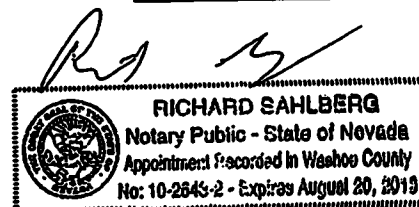
BY PRO-SE PLAINTIFFS TERRY KERR Terry Kerr

BY PRO-SE PLAINTIFFS DENNIS KERR Dennis Kerr

SUBSCRIBED AND SWORN TO BEFORE ME RICHARD SAHLBERG

A NOTARY PUBLIC WHOSE COMMISSION EXPIRES 8/20/18

NOTARY STAMP





CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT A COPY OF THE AFFIDAVIT IN SUPPORT OF THE AMENDED MOTION FOR DEFAULT WAS SENT TO THE DEFENDANTS AT THE U.S. BANK N.A. 301 VASSAR STREET , RENO, NEVADA 89502 ON THIS 8th DAY OF APRIL, 2017 BY U.S. MAIL.

DONE AND DATED THIS 8th DAY OF APRIL, 2017.

BY PLAINTIFF PRO-SE TERRY KERR Terry Kerr

BY PLAINTIFF PRO-SE DENNIS KERR Dennis Kerr

TERRY KERR  
DENNIS KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266  
PRO-SE PLAINTIFFS

ORIGINAL

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

TERRY KERR AND DENNIS KERR, )

PLAINTIFFS, )

-V- )

U.S. BANK N.A. AND U.S. BANK )  
N.A. AS TRUSTEE OF SW REO )  
TRUST 2014-1, BANK OF AMERICA )  
N.A., MICHEAL BROOKS ESQ., )  
RAMIR HERNANDEZ ESQ., DARREN )  
BRENNER ESQ., WILLIAM HABDAS )  
ESQ., RICHARD REYNOLDS ESQ., )  
R. ARRON CHASTAIN ESQ., AND )  
HARMONY TITLE AGENCY, PLUS )  
DOES 1-10. )

DEFENDANTS. )

CASE NO. 3:17-CV-00012-RJC-VPC

MEMORANDUM OF COSTS  
AND DISBURSEMENTS

MEMORANDUM OF COSTS AND DISBURSEMENTS

STATE OF NEVADA )

)

COUNTY OF WASHOE )

COMES NOE PRO-SE PLAINTIFFS TERRY KERR AND DENNIS KERR  
WITH THEIR MEMORANDUM OF COSTS AND DISBURSEMENTS AND HEREBY  
SWEAR UNDER PENALTY OF PERJURY THAT THE FOLLOWING ASSERTIONS  
ARE TRUE TO THE BEST OF THEIR KNOWLEDGE AND BELIEF AS PROVIDED:

1. FILING FEE

\$400

2. SERVICE FEE	\$100
3. COPIES, MAIL, POSTAGE	\$38
4. LIS PENDANS RECORDING FEES	\$ 54
5. RELIEF DEMANDED FROM U.S. BANK	\$268,000
6. TOTAL OF COST, FEES, COMPLAINT DEMAND	\$268,592
8. AS DOCUMENTED IN THE COMPLAINT	

DONE AND DATED THIS <sup>TH</sup> 10 DAY OF APRIL, 2017

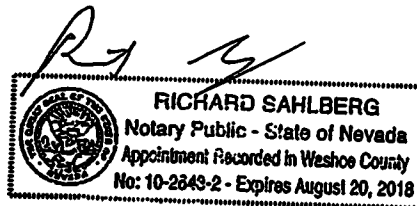
BY PRO-SE PLAINTIFF TERRY KERR Terry Kerr

BY PRO-SE PLAINTIFF DENNIS KERR Dennis Kerr

SUBSCRIBED AND SWORN TO BEFORE ME Richard Sahlberg

A NOTARY WHOSE COMMISSION EXPIRES 8/20/18

NOTARY STAMP



TERRY KERR  
DENNIS KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266  
PRO-SE PLAINTIFFS

ORIGINAL

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

TERRY KERR AND DENNIS KERR, )

PLAINTIFFS, )

-V- )

U.S. BANK N.A. AND U.S. BANK )  
N.A. AS TRUSTEE OF SW REO )  
TRUST 2104-1, BANK OF AMERICA )  
N.A., MICHEAL BROOKS ESQ., )  
RAMIR HERNANDEZ ESQ., DARREN )  
BRENNER ESQ., WILLIAM HABDAS )  
ESQ., RICHARD REYNOLDS ESQ., )  
R. ARROW CHASTAIN ESQ., AND )  
HARMONY TITLE AGENCY, PLUS )  
DOES 1-10. )

DEFENDANTS. )

CASE NO. 3:17-CV-00012-RJC-VPC

NOITCE OF AMENDED DEFAULT

DEFAULT

IT APPEARING THAT THE U.S. BANK N.A. THE ABOVE APPEARING  
AND NAMED DEFENDANT HEREIN IS IN DEFAULT FOR FAILURE TO PLEAD  
OR OTHERWISE DEFEND AS REQUIRED BY LAW.

DEFAULT IS HEREBY ENTERED AGAINST THE DEFENDANTS THIS

\_\_\_ DAY OF APRIL, 2017.

DATED THIS \_\_\_ DAY OF APRIL, 2017.

\_\_\_\_\_  
DEPUTY CLERK

TERRY KERR  
DENNIS KERR  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-520-7266  
PRO-SE PLAINTIFFS

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

TERRY KERR AND DENNIS KERR )  
PLAINTIFFS, )

-V- )

CASE NO. 3:17-CV-00012-RJC-VPC

U.S. BANK N.A. AND U.S. BANK )  
N.A. AS TRUSTEE OF SW REO )  
TRUST 2014-1, BANK OF AMERICA )  
N.A., MICHEAL BROOKS ESQ., )  
RAMIR HERNANDEZ ESQ., DARREN )  
BRENNER ESQ., WILLIAM HABDAS )  
ESQ., RICHARD REYNOLDS ESQ., )  
R.ARROR CHASTAIN ESQ., AND )  
HARMONY TITLE AGENCY, PLUS )  
DOES 1-10. )

AMENDED DEFAULT JUDGEMENT

DEFENDANTS. )  

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AMENDED DEFAULT JUDGEMENT

THE DEFENDANTS U.S. ABNK N.A. HAVING FAILED TO PLEAD OR  
OTHERWISE DEFEND THIS ACTION AND THE AMENDED DEFAULT JUDGEMENT  
OF THE DEFENDANT U.S. BANK N.A. HAVING BEEN DULY ENTERED.

NOW, UPON APPLICATION OF THE PLAINTIFFS ABOVE NAMED AND  
UPON AFFIDAVIT, MEMORANDUM, AND MOTION ARE INDEBTED TO THE  
PLAINTIFFS IN THE SUM OF \$268,592 DOLLARS. ALSO THAT THE  
DEFENDANT IS NOT IN THE MILITARY, NOR AN INFANT, OR AN  
INCOMPETANT PERSON. IT IS HEREBY ORDERED, ADJUDGED, AND  
DECREED, THAT THE U.S. BANK N.A.DID NOT PLEAD OR OTHERWISE  
DEFEND THIS ACTION THAT THE DEFENDANT WAS SUBSERVED WITH

A SUMMONS AND COMPLAINT AT THE U.S. BANK N.A. AT 301 VASSAR STREET, RENO, NEVADA, 89502 ON JANUARY 11, 2017, AND DID NOT ANSWER THE SUMMONS AND COMPLAINT IN THE LEGAL TIME ALLOWED.

THE PLAINTS ARE TO RECOVER FROM THE DEFENDANT U.S. BANK N.A. THE SUM OF \$268,592 DOLLARS.

DATED THIS \_\_\_\_ DAY OF APRIL, 2017.

.....  
  
\_\_\_\_\_  
FEDERAL COURT JUDGE

CRIMINAL COMPLAINT TO THE NEVADA STATE  
ATTORNEY GENERALS OFFICE, HONORABLE  
ADAM LAXALT, ATTORNEY GENERAL

DENNIS KERR,  
580 ASWAN STREET  
SPARKS, NEVADA 89441  
208-52-7266

JANUARY 5, 2017

RE: SUBMITTING FORGED AND FALSIFIED DOCUMENTS  
TO THE COURT TO MAKE A WRONGFULL OBJECTIVE  
LEGAL THREW ILLEGAL WRONGFULL CONDUCT

GREETINGS NEVADA STATE ATTORNEY ADAM LAXALT,

I DENNIS KERR AND MY FATHER TERRY KERR WANT A COMPLAINT FILED  
AGAINST BAD FAITH MISCONDUCT ATTORNEYS, ( MICHEAL BROOKS, RAMIR  
HERNANDEZ, DARREN BRENNER, WILLIAM HADBAS, AND RICHARD REYENOLDS  
FOR USE OF WRONGFULL DECEPTIVE DOCUMENTS THAT WERE FORGED AND  
FALSIFIED BY THE TITLE COMPANY THAT THEY OWN! THE MAKING OF AN  
LEGAL OBJECTIVE BY ILLEGAL MEANS. THE LAST TIME THIS HAPPENED  
THE STATE ATTORNEY GENERAL CATHINE MASTO CORTEZ DID HELP US.  
THE EVIDENSE, THE FACTS, THE TRUTH, AND THE WRONGFULL ILLEGAL  
MISCONDUCT IS TOTALLY PROVEN IN THE ATTACHED EXHIBITS OF PROOF!  
PLEASE READ THE ATTACHED DOCUMENTS AND EXHIBITS OF  
PROOF AND THEN TELL US WHAT CAN BE DONE.  
THANK YOU FOR YOUR TIME AND CONCERN IN THIS MATTER.

SINCERELY DENNIS KERR AND TERRY KERR

Dennis Kerr Terry Kerr